



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

KMT/AAS
F. #2015R01817

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 11, 2016

By Hand Delivery and ECF

Michael P. Padden, Esq.
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Eduardo Cornejo
Criminal Docket No. 16-096 (BMC)

Dear Mr. Padden:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery in the above-referenced matter. The government also requests reciprocal discovery from the defendant.

Discovery Exhibit	Bates range	Description	VDM/SVDM¹
13	005347-005392	Documents related to a search warrant for the defendant's telephone assigned number ending in 0046.	VDM
14	N/A	Thumb drive containing results of a search of defendant's telephone assigned number ending in 0046.	SVDM
15	005393-009450	Phone records for telephones assigned numbers ending in 0046, 3731 and 8557.	VDM

¹ All Rule 16 discovery disclosed in this case is subject to the protective order entered on March 23, 2016 (the "March 23, 2016 Order") (Dkt. No. 18). Items designated herein as Victim Discovery Material ("VDM") or "Sensitive Victim Discovery Material" ("SVDM") are subject to the restrictions set forth in the March 23, 2016 Order.

16	009451-009460	Documents related to a pen register for telephone assigned number ending in 0046.	VDM
17	009461-009516	Pen register data for telephone assigned number ending in 0046.	VDM
18	009517-009526	Documents related to a pen register for telephone assigned number ending in 8557.	VDM
19	009527-009776	Pen register data for telephone assigned number ending in 8557.	VDM
20	Excel file with file name 009777.GPS historical data.csv	GPS data collected pursuant to warrant disclosed as Discovery Exhibit 5, bearing bates numbers 000071-00091.	

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/
Alex Solomon
Kevin Trowel
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)